



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: THE COMMISSION
STAFF DIRECTOR
GENERAL COUNSEL
FEC PRESS OFFICE
FEC PUBLIC RECORDS *MWD*

FROM: COMMISSION SECRETARY

DATE: August 22, 2003

SUBJECT: COMMENT: DRAFT AO 2003-22

Transmitted herewith is a timely submitted comment from Mr. Harry J. Argue, Executive Vice President/CEO, of the Wisconsin Bankers Association regarding the above-captioned matter.

Proposed Advisory Opinion 2003-22 is on the agenda for Thursday, August 28, 2003

Attachment:

1 page



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SECRETARIAT

2003 AUG 22 A 9 48

August 20, 2003

Mr. Lawrence H. Norton, Esq.
General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2003 AUG 21 P 12:55

RE: Advisory Opinion Request 2003-22

Dear Mr. Norton:

The Wisconsin Bankers Association ("WBA") is the largest financial institution trade association in Wisconsin, representing over 320 state and nationally chartered banks, savings banks, and savings and loan associations located in communities throughout the state. WBA has a federal separate segregated fund, WISBANKPAC, that solicits contributions in a similar manner to that of the American Bankers Association's ("ABA") federal separate segregated fund, ABA BankPAC. For purposes of federal campaign finance laws, WBA is also "affiliated" with ABA and, thus, shares the same federal contribution limitations. Consequently, WBA is very interested in the outcome of Advisory Opinion Request ("AOR") 2003-22 and strongly supports ABA's concerns.

Like ABA, WBA solicits contributions to WISBANKPAC from executive and administrative personnel of member financial institutions who have provided the annual authorization required under 11 C.F.R. §114.8(c). Like ABA, WBA asks its member financial institutions to assist in such solicitations by having persons at the financial institution solicit their fellow executive and administrative personnel, in accordance with FEC rules and using solicitation materials prepared and given to them by WISBANKPAC. This is a practically efficient method of collection that utilizes only a minimal amount of a WBA member's time.

It is significant to note that fundraising efforts for WISBANKPAC do not go to support only one candidate or even one party. Disbursements from WISBANKPAC go to candidates who consider the industry's efforts regardless of their party affiliation. WBA joins ABA in requesting that the Commission confirm that the practices as outlined in AOR 2003-22 are permissible under federal laws and regulations.

WBA appreciates the opportunity to comment on AOR 2003-22. If you have any questions regarding this letter, please contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Harry J. Argue".

Harry J. Argue, CAE
Executive Vice President/CEO

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